



VALUE · DRIVEN · LAW

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**INVOICE**

Invoice # 10694  
Date: 12/16/2024  
Due Upon Receipt

Janet Northrup (HWA Attorney for Trustee)

**2023-02460-Mountain Express Oil Company (Attorney for Trustee)****Services**

| Date       | Attorney | Notes  | Quantity | Rate     | Total    |
|------------|----------|--|----------|----------|----------|
| 11/01/2024 | HM       | 2-Asset Analysis and Recovery: Receive and review details regarding fuel pumps to possibly auction (.1) and review abandonment and sale motion as to property of the estate and authority to sell issues (.1) and confer with DIP Agent counsel regarding same (.1). | 0.30     | \$725.00 | \$217.50 |
| 11/01/2024 | HM       | 30-Litigation: Receive and review email from J. Johnston threatening actions in violation of the automatic stay (.1) and confer with Trustee and proposed special counsel regarding same (.1).   | 0.20     | \$725.00 | \$145.00 |
| 11/04/2024 | HM       | 30-Litigation: Receive and review order granting Trustee's motion to substitute Greenberg Traurig on collection matters formerly handled by James Johnston.  | 0.10     | \$725.00 | \$72.50  |
| 11/04/2024 | HM       | 2-Asset Analysis and Recovery: Confer with DIP Agent regarding release of escrowed funds associated with closing.  | 0.10     | \$725.00 | \$72.50  |
| 11/05/2024 | HM       | 18-Use of Cash Collateral: Follow up with DIP Agent on approval of Q4 cash collateral budget.  | 0.10     | \$725.00 | \$72.50  |
| 11/05/2024 | HM       | 2-Asset Analysis and Recovery: Receive and review payment status for CNR and confer with Trustee regarding same.   | 0.10     | \$725.00 | \$72.50  |
| 11/05/2024 | HM       | 2-Asset Analysis and Recovery: Review proposed release of UCC lien requested by Hasalani and Dilshad and confer with DIP Agent regarding same.   | 0.10     | \$725.00 | \$72.50  |
| 11/05/2024 | HM       | 2-Asset Analysis and Recovery: Review mail for potential assets including more than \$7K in outstanding checks due from Tennessee.   | 0.50     | \$725.00 | \$362.50 |

|            |    |   |      |          |          |
|------------|----|---|------|----------|----------|
| 11/05/2024 | HM | 2-Asset Analysis and Recovery: Prepare letter to Tennessee for turnover of any amounts due to the Debtors.  | 0.30 | \$725.00 | \$217.50 |
| 11/05/2024 | HM | 32-Fee Applications: Revise HWA October time for fee statement in compliance with order on interim professional fees.   | 0.40 | \$725.00 | \$290.00 |
| 11/05/2024 | HM | 2-Asset Analysis and Recovery: Follow up with Quality Signs regarding stipulation order to release non property of the estate funds.  | 0.10 | \$725.00 | \$72.50  |
| 11/07/2024 | AL | 32-Fee Applications: Draft HWA's Fee Statement for October 2024 and compile exhibit on same (.1), update chart on same (.4).  | 0.50 | \$350.00 | \$175.00 |
| 11/07/2024 | HM | 30-Litigation: Confer with special counsel and Trustee regarding litigation strategy.   | 0.10 | \$725.00 | \$72.50  |
| 11/07/2024 | HM | 1-General Administration: Receive and review inquiry from UST regarding criminal fraud issues.  | 0.10 | \$725.00 | \$72.50  |
| 11/07/2024 | HM | 2-Asset Analysis and Recovery: Receive and review order regarding return of funds to Quality Signs and confer with Trustee regarding same.  | 0.10 | \$725.00 | \$72.50  |
| 11/07/2024 | HM | 32-Fee Applications: Receive and review order granting Trustee fee application.   | 0.10 | \$725.00 | \$72.50  |
| 11/07/2024 | WK | 1-General Administration: Review correspondence from US Trustee regarding fraud allegations (.2); discuss same with Trustee and Special Counsel (.2).                                       | 0.40 | \$800.00 | \$320.00 |
| 11/07/2024 | WK | 30-Litigation: Emails to and from Trustee and Special Counsel regarding mediation.  | 0.30 | \$800.00 | \$240.00 |
| 11/07/2024 | WK | 30-Litigation: Emails to and from S. Rosenwasser regarding Bierenbaum complaint (.2); discuss same with H. McIntyre and Trustee (.1).   | 0.30 | \$800.00 | \$240.00 |
| 11/08/2024 | HM | 3-Asset Sales: Confer with broker regarding buyer further delay on Williston sale.  | 0.10 | \$725.00 | \$72.50  |
| 11/08/2024 | HM | 7-Claims Administration, Analysis and Objections: Receive and review incoming chapter 11 expense claim in accordance with court-approved procedures obviating need for immediate objection. | 0.10 | \$725.00 | \$72.50  |
| 11/08/2024 | HM | 32-Fee Applications: Receive and review order approving HWA 4th interim fee application and confer with Trustee regarding same.   | 0.10 | \$725.00 | \$72.50  |
| 11/11/2024 | HM | 30-Litigation: Telephone conference with J. Elrod and S. Rossenwasser regarding open issues including litigation and Williston closing.   | 0.30 | \$725.00 | \$217.50 |
| 11/11/2024 | HM | 18-Use of Cash Collateral: Receive and review approval for Q4 cash collateral budget.   | 0.10 | \$725.00 | \$72.50  |
| 11/11/2024 | HM | 3-Asset Sales: Confer with broker on status of  | 0.10 | \$725.00 | \$72.50  |

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|------------|----|---|------|----------|----------|
|            |    | closing Williston and additional time requested by buyer.   |      |          |          |
| 11/12/2024 | HM | 5-Tax Matters: Receipt and review status of returns from C. Crane.  | 0.10 | \$725.00 | \$72.50  |
| 11/13/2024 | AE | 3-Asset Sales: Contract for the sale of Williston, ND property: Review contract documents (.4) and confer with Kelly T. regarding new amendment and earnest money provision (.4).                                   | 0.80 | \$500.00 | \$400.00 |
| 11/13/2024 | HM | 3-Asset Sales: Negotiate terms for further extended closing date on Willison sale (.3); review and revise fourth amendment to sale contract (.1).   | 0.40 | \$725.00 | \$290.00 |
| 11/14/2024 | AL | 30-Litigation: Download and review Motion for Turnover and circulate same to H. McIntyre.   | 0.20 | \$350.00 | \$70.00  |
| 11/14/2024 | HM | 18-Use of Cash Collateral: Receipt and review of Porter & Hedges fee statement for compliance with cash collateral budget.  | 0.10 | \$725.00 | \$72.50  |
| 11/14/2024 | HM | 3-Asset Sales: Receipt and review of inquiry regarding sale of property and confirm non-debtor property and respond accordingly.  | 0.10 | \$725.00 | \$72.50  |
| 11/14/2024 | HM | 3-Asset Sales: Receipt and review of buyer's counter to proposed amendment, review of PSA for default provisions in relation to earnest money an consider options for Trustee's consideration as to Williston sale. | 0.40 | \$725.00 | \$290.00 |
| 11/14/2024 | HM | 3-Asset Sales: Telephone conference with K. Toney regarding possible re-marketing of property and interest in Williston.  | 0.20 | \$725.00 | \$145.00 |
| 11/14/2024 | HM | 30-Litigation: Confer with special counsel on Blue Owl mediation.   | 0.10 | \$725.00 | \$72.50  |
| 11/14/2024 | HM | 23-Monthly Operating Reports: Review and revise October MOR.  | 0.20 | \$725.00 | \$145.00 |
| 11/15/2024 | AL | 23-Monthly Operating Reports: Review Monthly Operating Report for October 2024 (.1) and attend to filing same (.1).   | 0.20 | \$350.00 | \$70.00  |
| 11/15/2024 | AL | 30-Litigation: Review Order Setting Hearing on Motion for Turnover.   | 0.10 | \$350.00 | \$35.00  |
| 11/15/2024 | AL | 32-Fee Applications: Draft Trustee's Monthly Fee Statement for October 2024 and compile exhibits (.5) and update chart reflecting calculations same (.1).   | 0.60 | \$350.00 | \$210.00 |
| 11/15/2024 | HM | 3-Asset Sales: Confer with DIP Agent counsel on status of Williston closing.  | 0.10 | \$725.00 | \$72.50  |
| 11/15/2024 | HM | 32-Fee Applications: Review Trustee fee statements for compliance with order on interim compensation.   | 0.10 | \$725.00 | \$72.50  |

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|------------|----|--|------|----------|----------|
| 11/15/2024 | HM | 5-Tax Matters: Request status of tax returns from Whitley Penn.  | 0.10 | \$725.00 | \$72.50  |
| 11/18/2024 | AL | 32-Fee Applications: Update draft Trustee Fee Statement for October 2024 and attend to filing same.  | 0.20 | \$350.00 | \$70.00  |
| 11/18/2024 | HM | 2-Asset Analysis and Recovery: Receive and review revisions to lien release for P. Holzer client.  | 0.10 | \$725.00 | \$72.50  |
| 11/18/2024 | HM | 3-Asset Sales: Confer with broker regarding response to inquiries on Williston.  | 0.10 | \$725.00 | \$72.50  |
| 11/18/2024 | HM | 3-Asset Sales: Investigate de minimis sale of property at 500 E. Walnut to Keller Trustee and confer with J. Eiband regarding same.  | 0.20 | \$725.00 | \$145.00 |
| 11/18/2024 | HM | 30-Litigation: Receive and review further information regarding Four Court transfers and confer with special counsel regarding same.   | 0.10 | \$725.00 | \$72.50  |
| 11/19/2024 | HM | 7-Claims Administration, Analysis and Objections: Respond to chapter 11 administrative claimant inquiry.   | 0.10 | \$725.00 | \$72.50  |
| 11/20/2024 | HM | 18-Use of Cash Collateral: Telephone conference with G. Juengling to review cash analysis for interim distribution and budgeting purposes.   | 0.40 | \$725.00 | \$290.00 |
| 11/20/2024 | HM | 30-Litigation: Confer with Trustee regarding strategy for Blue Owl mediation.  | 0.20 | \$725.00 | \$145.00 |
| 11/21/2024 | HM | 2-Asset Analysis and Recovery: Confer with DIP Agent on settlement amount for Hasanali & Dilshad.  | 0.10 | \$725.00 | \$72.50  |
| 11/21/2024 | HM | 2-Asset Analysis and Recovery: Send release to P. Holzer in trust pending settlement payment to DIP Agent.   | 0.10 | \$725.00 | \$72.50  |
| 11/22/2024 | HM | 30-Litigation: Telephone conference with special counsel and Trustee regarding Blue Owl mediation.   | 0.50 | \$725.00 | \$362.50 |
| 11/22/2024 | HM | 3-Asset Sales: Confer with Trustee on negotiating authority for further extension on Williston closing (.1), telephone conference with auctioneer regarding status of negotiations (.1) and continue negotiations with buyer (.2); apprise DIP Agent of same (.1). | 0.50 | \$725.00 | \$362.50 |
| 11/22/2024 | HM | 30-Litigation: Work on claims analysis as damage model for Blue Owl mediation.   | 0.20 | \$725.00 | \$145.00 |
| 11/22/2024 | HM | 1-General Administration: Telephone conference with Jayson Ruff for UST regarding investigation status.  | 0.20 | \$725.00 | \$145.00 |
| 11/22/2024 | HM | 2-Asset Analysis and Recovery: Review notice of abandonment, fuel dispensers location and confer with DIP Agent counsel regarding disposition of same.   | 0.20 | \$725.00 | \$145.00 |

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|------------|----|---|------|----------|------------|
| 11/25/2024 | HM | 30-Litigation: Telephone conference with special litigation counsel regarding ongoing litigation issues.  | 0.30 | \$725.00 | \$217.50   |
| 11/25/2024 | HM | 3-Asset Sales: Continue to negotiate terms for fourth extension on Williston closing.                     | 0.10 | \$725.00 | \$72.50    |
| 11/25/2024 | HM | 5-Tax Matters: Follow up with tax accountants on status of federal and tax return preparation and filing. | 0.10 | \$725.00 | \$72.50    |
| 11/25/2024 | HM | 30-Litigation: Review privilege review protocols requested by Bierenbaums in pre-litigation.              | 0.20 | \$725.00 | \$145.00   |
| 11/26/2024 | WK | 30-Litigation: Emails to and from Rosenwasser and Trustee regarding complaint against Wadud, et al.       | 0.30 | \$800.00 | \$240.00   |
| 11/26/2024 | WK | 30-Litigation: Review and revise first 50 pages of 225 page complaint against Blue Owl, et al.            | 2.50 | \$800.00 | \$2,000.00 |
| 11/27/2024 | WK | 30-Litigation: Continue to edit the next 75 pages of the Bierenbaum complaint; discuss same with Trustee. | 3.00 | \$800.00 | \$2,400.00 |

**Quantity Subtotal 18.5**

**Services Subtotal \$13,067.50**

### Expenses

| Type    | Date       | Attorney | Notes  | Quantity | Rate    | Total   |
|---------|------------|----------|--|----------|---------|---------|
| Expense | 11/06/2024 | LS       | E108 Postage: Postage for mailing tax documents to Whitley Penn. | 1.00     | \$13.65 | \$13.65 |
| Expense | 11/07/2024 | LS       | E108 Postage: Postage for HWA 14th Fee Notice.                   | 23.00    | \$0.69  | \$15.87 |
| Expense | 11/07/2024 | LS       | E101 Copying: Copies for HWA 14th Fee Notice.                    | 115.00   | \$0.20  | \$23.00 |

**Expenses Subtotal \$52.52**

| Time Keeper         | Quantity | Rate     | Total      |
|---------------------|----------|----------|------------|
| Aaron Espinoza      | 0.8      | \$500.00 | \$400.00   |
| Wayne Kitchens      | 6.8      | \$800.00 | \$5,440.00 |
| Abdiel Lopez-Castro | 1.8      | \$350.00 | \$630.00   |
| Heather McIntyre    | 9.1      | \$725.00 | \$6,597.50 |

**Quantity Total 18.5**

**Subtotal \$13,120.02**

**Total \$13,120.02**

Please make all amounts payable to: HughesWattersAskanase

To pay by credit card you may go through our link at: <https://app.clio.com/link/7e3rrnDf7g9g>

## Mountain Express Oil Company

| Task Code and Timekeeper                                      | Sum of Hours | Sum of Billable    |
|---|--------------|--------------------|
| Heather McIntyre  | 0.3          | \$217.50           |
| Wayne Kitchens  | 0.4          | \$320.00           |
| <b>1-General Administration Total</b>                         | <b>0.7</b>   | <b>\$537.50</b>    |
| Heather McIntyre  | 2.1          | \$1,522.50         |
| <b>2-Asset Analysis and Recovery Total</b>                    | <b>2.1</b>   | <b>\$1,522.50</b>  |
| Aaron Espinoza  | 0.8          | \$400.00           |
| Heather McIntyre  | 2.3          | \$1,667.50         |
| <b>3-Asset Sales Total</b>                                    | <b>3.1</b>   | <b>\$2,067.50</b>  |
| Heather McIntyre  | 0.3          | \$217.50           |
| <b>5-Tax Matters Total</b>                                    | <b>0.3</b>   | <b>\$217.50</b>    |
| Heather McIntyre  | 0.2          | \$145.00           |
| <b>7-Claims Administration, Analysis and Objections Total</b> | <b>0.2</b>   | <b>\$145.00</b>    |
| Heather McIntyre  | 0.7          | \$507.50           |
| <b>18-Use of Cash Collateral Total</b>                        | <b>0.7</b>   | <b>\$507.50</b>    |
| Abdiel Lopez-Castro   | 0.2          | \$70.00            |
| Heather McIntyre  | 0.2          | \$145.00           |
| <b>23-Monthly Operating Reports Total</b>                     | <b>0.4</b>   | <b>\$215.00</b>    |
| Abdiel Lopez-Castro   | 0.3          | \$105.00           |
| Heather McIntyre  | 2.3          | \$1,667.50         |
| Wayne Kitchens  | 6.4          | \$5,120.00         |
| <b>30-Litigation Total</b>                                    | <b>9</b>     | <b>\$6,892.50</b>  |
| Abdiel Lopez-Castro   | 1.3          | \$455.00           |
| Heather McIntyre  | 0.7          | \$507.50           |
| <b>32-Fee Applications Total</b>                              | <b>2</b>     | <b>\$962.50</b>    |
| <b>Grand Total</b>  | <b>18.5</b>  | <b>\$13,067.50</b> |